

Consultation response document for

Laundry detergents and stain removers



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Nordic Ecolabelling for Laundry detergents and stain removers -
Consultation response document
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1 Summary

The final consultation on revising the criteria for laundry detergents and stain removers has been conducted in the period from August 12 – September 8, 2019. All consultation documents are located at: <http://www.nordic-ecolabel.org/criteriarevisions/laundry-detergents/>. The final proposal was commented by 16 stakeholders and total of 50 different stakeholders commented at least one of the consultations.

The introduction of the requirements on sustainable renewable raw materials was supported. The new consumer guidance requirements for recycling and dosage were also supported, but some questions arose, and minor changes have been made.

The biggest changes after the sub consultation have been made to the packaging requirements. The idea of recycling and recyclability seems to be generally accepted but details cause concern and several adjustments and changes have been made to the requirements.

The definition of microplastics was changed to the one used in EU Ecolabel as the ECHA definition is not final yet. However, a disclaimer that the definition might be changed after the ECHA restriction proposal is finalized has been added. An appropriate transition period would be decided.

Smaller adjustments and clarifications have been made to other requirements. In section 6, you find a table showing all the main changes that have been done in the criteria document after the consultation.

Nordic Ecolabelling has in section 4 given a response to all comments and described if the requirement has been adjusted.

2 About the consultation

This document consists of feedback received during the public final consultation for revised criteria for laundry detergents and stain removers, and Nordic Ecolabelling's response to this feedback. The purpose of this document is to show how external feedback has affected the development of the criteria in compliance with the ISO 14024 standard.

Nordic Ecolabelling is grateful for all incoming input that helped us in the development of both ambitious environmental as well as market based draft criteria for laundry detergents and stain removers.

The consultation was divided into three sub processes, each dealing with one or several specific topics, in three separate sub consultation periods as well as a final consultation of the whole criteria draft. The topics in the three sub consultation periods were:

1. Packaging and recycling
2. Correct dosing, ecotoxicity and efficiency
3. Sustainable renewable raw materials and microplastics.

The first sub consultation was sent to all identified stakeholders in the Nordic region as well as to stakeholders in some other European countries. The second and third sub consultations were only sent to selected stakeholders, as well as to those who had actively signed up to participate in the consultation process.

After the three sub consultation periods, Nordic Ecolabelling drafted a proposal for criteria for laundry detergents and stain removers, based on the received feedback, for a final public consulting period.

The final consultation was again sent to all identified stakeholders in the Nordic region as well as to stakeholders in some other European countries.

This document compiles the received comments for the final consultation and Nordic Ecolabelling's response to all comments.

Documents containing proposed requirements for all three sub processes and final consultation are located on: <http://www.nordic-ecolabel.org/criteria-revisions/laundry-detergents/>

3 Compilation of incoming comments and feedback

In total, 16 stakeholders commented the proposal and two stated that they refrain from commenting. Most stakeholders (13) just sent in comments, two also stated that they reject the proposal and one supported the proposal with comments. These are listed in the table 1 below.

During the whole consultation process a total of 50 different stakeholders commented at least one of the consultations. To each sub consultation and the final consultation 15-19 responses were received.

Table 1: Stakeholder consultation comments.

| Consulting party | A. Just commenting | B. Supports the proposal | C. Supports the proposal with comments | D. Refrains from commenting | E. Rejects the proposal with justification |
|--|--------------------|--------------------------|--|-----------------------------|--|
| Auraprint | X | | | | |
| BlueSun Consumer Brands S.L.U | X | | | | |
| Danish Consumer Council – Forbrugerrådet Tænk | X | | | | |
| Dansk Vask-, Kosmetik- og Husholdningsindustri | | | | | X |
| Diversey | X | | | | |

| | | | | | |
|--------------------------------------|----|--|---|---|---|
| Faerch Group A/S | X | | | | |
| KiiltoClean Oy | X | | | | |
| Konsumentverket | | | | X | |
| Kosmetik- och Hygienföretagen | | | | | X |
| Kosmetik- og hygiejnebranchen | X | | | | |
| Lactips | X | | | | |
| Miljø- og Fødevareministeriet | | | X | | |
| Novozymes A/S | X | | | | |
| Nopa Nordic | X | | | | |
| Orkla Home&Personal Care | X | | | | |
| RB | X | | | | |
| Suomen Uusiomuovi Oy | X | | | | |
| Upphandlingsmyndigheten | | | | X | |
| Varefakta | X | | | | |
| Σ: | 13 | | 1 | 2 | 2 |

4 Comments to the criteria in detail

The various comments from the consultation parties have been inserted below and grouped in relation to the specific requirements. Nordic Ecolabelling has given a response to all comments and described if the requirement has been adjusted. If several stakeholders have given the same comment a general response is written to all. In section 6, you find a table showing all the main changes that has been done in the criteria document after the consultation.

4.1 General comments

Danish Consumer Council

Ingredients listing

We really would recommend, that you include a requirement of full ingredient listing.

This is an important transparency, and it is obvious, that the Ecolabels should be forerunners in this. Many ecolabelled products that also have The Blue Label already have this listing, and it would be no further work. For other products, the information has to be available online anyway, adding the information to the packaging will just make it easier for the consumers to access.

Comments from Nordic Ecolabelling

Thank you for your comments. There is already a lot of information on the label and e.g. allergens must always be stated. As you mention a full ingredient must be available online. As there is limited space on the packaging and Nordic Ecolabelling limits the size of the label due to recycling, Nordic Ecolabelling chooses to instead of a full ingredient listing require user, dosage and recycling information on the label as these have environmental benefits.

Miljø- og Fødevarerministeriet

Miljø- og Fødevarerministeriet har til denne høring indhentet bidrag fra Miljøstyrelsen. Her bringes de samlede kommentarer. Overordnet finder Miljø- og Fødevarerministeriet (MFVM), at kriterierne generelt set er relevante, ligger over lovgivningen og kan være med til at flytte markedet.

Comments from Nordic Ecolabelling

Tack för stödet.

Kosmetik- och Hygienföretagen

Kriterierna för textiltvättmedel och fläckborttagning har funnits under mycket lång tid. Vi anser att det är dags för ett helt nytt omtag för den här produktgruppen. Det är inte rimligt att fortsätta skruva på samma parametrar och ingående ämnen som man började med för 20 år sedan. Produkterna och marknaden har utvecklats och vi anser att det är dags att se över vilka parametrar som verkligen ger den miljövinst som Svanen-märkningen ska innebära. Det anges i bakgrundsdocumentet att de viktigaste parametrarna är användningsfasen och ”ingredient sourcing”. Trots det handlar övervägande delen av kriterierna om förbjudna ämnen och förbjudna klassificeringar eller ingående ämnen i förpackningen.

Vi anser också att krav som finns i EU-lagstiftning, till exempel gällande fosfat eller andra ämnen, doseringsanvisningar, mikroplast (kommande), inte ska ingå i Svanens kriterier. Att uppfylla lagstiftningen är ett grundkrav för att kunna miljömärka en produkt med Svanen. Svanen behöver inte dubbla dessa krav.

Comments from Nordic Ecolabelling

Nordisk Miljömärkning takker for deres innspill. Hovedfokus i denne revisjonen har vært på nye områder, nemlig gjenvinningsdesign for emballasje og bærekraftige fornybare råvarer. Samtidig anser vi fortsatt at krav til ingredienser og for eksempel fosfat og dosering er relevant, fordi vi her går utover kravene i lovverket. Enkelte, mindre justeringer i disse kravene er foretatt for at kravene fortsatt skal være relevante, slik at Svanen skiller ut de miljømessig beste produktene .

Dansk Vask-, Kosmetik- og Husholdningsindustri

VKH takker for muligheden for at afgive høringssvar til ovennævnte kriteriedokument. Pro-cessen med flere høringer har vi oplevet som positivt. I det følgende vil vi kommentere på de enkelte punkter på dansk, men henvise til de engelske formuleringer i kriteriedokumentet version 8.0. Overordnet kan VKH ikke tilslutte sig kriterierne i den form de har fået efter delhøringerne. Vi er dog tilfredse med, at der har været lydhørhed overfor de kritikpunkter VKH og andre aktører har rejst i forbindelse med delhøringerne. Flere punkter står således stadig tilbage med uklarheder eller forbedringspotentialer. Generelt har vi en oplevelse af, at kriterierne bliver smallere, og rammerne for produktudvikling derved bliver udfordrede, hvilket gør det svært for vores kunder at differentiere sig i forhold til hinanden.

Comments from Nordic Ecolabelling

Nordisk Miljömärkning takker for svaret. Nordisk Miljømerking strammer inn kravene regelmessig (omtrent hvert 5. år), for å følge utviklingen i markedet og fremme miljømessig stadig bedre produkter. Det er en grunnpilar i vårt arbeid, i tråd med ISO 14024. Svanemerket skal skille ut de miljømessig beste produktene på

markedet. Dermed kan det være mer utfordrende å formulere Svanemerkede produkter enn andre produkter.

4.2 Comments to specific requirements

4.2.1 Requirements in section 1 General requirements

O2 Classification of the product

Miljø- og Fødevarerministeriet

På baggrund af Miljøstyrelsens rapport over “Substances in detergents” har vi ikke kendskab til ingredienser anvendt i detergenter, som er klassificeret som H420 (Hazardous to the ozone layer).

Comments from Nordic Ecolabelling

Vi är eniga att detta inte bör vara ett problem. Vi menar dock att det bör säkras att en Svanemärkt produkt inte klassificeras som miljöfarlig även om en märkning med H420 skulle vara mycket osannolikt.

Novozymes A/S

We strongly **oppose** and **object** to the change in criterion O2 and its consequences for inclusion of enzymes in detergents. The proposal to ban products carrying the EUH208 supplemental labelling phrase will limit enzyme inclusion to 0,1% and this would be in direct conflict with the green ambitions of Nordic ecolabelling.

Enzymes are environmentally friendly, biodegradable and sustainable detergent ingredients, that show negligible impact to the environment, are safe to use for consumers and can be handled safely by workers. Or to quote your own Background Document of August 12 (page 11): *“Enzymes may reduce the content of surfactants and decrease the content of chemicals used per wash and are generally less toxic to aquatic organisms than surfactants. Hence, the environmental benefits of enzymes are substantial.”*

Over the last decades, improvements to Nordic Ecolabelled products have largely been enabled by enzymes as substitutes for harsh chemistry and introducing a limit on enzyme inclusion will halt this development, if not set it back. We hear from our customers, that a main tool in their formulation toolbox, whenever ecolabel requirements are tightened, is to compensate with higher enzyme inclusion in order to not lose wash performance.

This will also put detergent manufacturers in the bizarre situation, that if they are ambitious enough to take the next big leaps towards even greener detergents, they will not be able to obtain the Nordic ecolabel for those, while they still can for their ‘less green’ detergents.

In conclusion, we strongly recommend that enzymes are removed from the scope of the new EUH208 requirement. This seems reasonable and straightforward, as enzymes are already exempt from the scope of **O5 Classification of ingoing substances**, and the good arguments given for this exemption (quoted above) should be equally valid for criterion O2.

Current text

** Products labelled with EUH208: “Contains (name of sensitising substance). May cause an allergic reaction.” cannot be Nordic Swan Ecolabelled.

Proposed text

** Products labelled with EUH208: “Contains (name of sensitising substance). May cause an allergic reaction.” cannot be Nordic Swan Ecolabelled, unless the sensitising substance is an enzyme that is exempt under the conditions stated in criterion O5.

Comments from Nordic Ecolabelling

Nordic Ecolabelling’s initial survey didn’t rise need for a exemption for EUH208 due to enzymes. Further dialogue with stakeholders has made us realize that as we now require more concentrated products this might become a problem and we have changed the requirement.

Dansk Vask-, Kosmetik- og Husholdningsindustri and Nopa Nordic

Vi foreslår at EUH208 bliver undtaget hvis det er et enzym som udløser sætningen. Vi kan godt se at det er oplagt i forhold til rengøring og opvaskemiddel, da det er produkter som forbrugeren er i tæt kontakt med. I forhold til tekstilvaskemiddel, så vaskes der normalt i en vaskemaskine og forbrugeren har derfor ikke fingrene i suppen. Vi foreslår, at hvis sætningen skal på produktet, så anbefaler vi, at forbrugeren bruger handsker ved håndvask.

Samtidig med at kravet strammes for doseringen, så har vi brug for at skrue på andre parametre for at levere det samme effektive tekstilvaskemiddel. Her er en af mulighederne at tilsætte mere enzym.

Comments from Nordic Ecolabelling

Tack för kommentaren. Vi har valt att ändra detta.

Varefakta

We have with great interest noted the requirement that product composition must not trigger EUH208 in O2. But as I understand it there is still an exemption for Subtilisin as described in O11? It might be helpful to refer to the exemption in O2.

Comments from Nordic Ecolabelling

We have decided to allow EUH208 due to enzymes. See the reply above. There is an exemption for subtilisin in O11, but this does not mean the product could classify as environmental hazardous. It is referred back to O2 in O11: “Note that all products need to fulfil requirement O2 regarding classification of the product.”

4.2.2 Requirements in section 2 Sustainable raw materials

Miljø- og Fødevareministeriet

På s. 5 i Nordisk Miljømærknings baggrundsdokument (http://www.nordic-ecolabel.org/contentassets/9c20cf70636b4f7588be21d41230e3d6/006eo_8_0_bd.pdf) fremgår det at (MFVM’s **fremhævning**):

Nordic Ecolabelling sets general requirements for raw material labels that are used in our criteria documents, and at the current time, RSPO7 do not fully meet them.

Generally, the standard provides too poor protection for important biological areas since it is among other things permitted to establish plantations on peat bogs, which are important carbon sinks. However, in product groups where there is a lack of better alternatives and no steerability for Nordic Ecolabelling to avoid palm oil, Nordic Ecolabelling sets as stringent requirements as possible. This means requiring RSPO certified raw materials, with its associated traceability systems.

Med den seneste revision af RSPO Principles & Criteria er dette kriterie 7.7 blev tilføjet (se evt. s. 57):

| | | | |
|-----|--|---|--|
| 7.7 | No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). | Ecosystems protected; Reduced pollution; Productivity optimised |
|-----|--|---|--|

Der henvises til *RSPO's Principles and Criteria for the Production of Sustainable Palm Oil 2018. Endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Members on 15 November 2018.*

MFVM støtter at sætte niveauet for RSPO palme olie ved *masse balance* som minimum, og mener, at Nordisk Miljømærkning bør være opmærksom på denne ændring i RSPO P&C, medmindre Nordisk Miljømærkning har andre grunde til at mene, at kriteriet ikke er tilstrækkeligt ambitiøst?

Ift. sukker og soja anfører Nordisk Miljømærkning "*Certification requirement is not set for other renewable raw materials since they are either less relevant in laundry detergents (soy or sugar) or there are not yet sustainability standards (coconut).*"

Dermed er det også fint at have et "*... cut off limit of 1% is set in order to reduce the burden of documentation and focus on the raw materials that are present at higher percentages (typically surfactants and solvents).*"

Med øgede krav til palmeolie bør Nordisk Miljømærkning dog være opmærksom på, at der kan ske et skift til andre fornybare råvarer, og derfor bør der stilles krav til bade soja og sukker, såfremt der anvendes over 1 pct. af vaskemidlet. Her kane RTRS og Bonsucro være de rette certificeringsordninger, og man kan starte ved at anerkende Book & Claim kreditter. MFVM har ikke kendskab til relevante standarder for kokosolie.

Comments from Nordic Ecolabelling

Tack för kommentaren och stödet. Vi är medvetna om att sista versionen av RSPO-standarderna har blivit bättre på många ställen, men menar fortfarande att det inte finns anledning att ändra texten än. Vi vet att det arbetas hårt med saken och vi följer utvecklingen och är beredda att ändra vårt perspektiv i framtiden.

Angående socker, soja och kokos är vi eniga att de är också problematiska. Mer kunskap om standarden och marknaden behövs dock innan ett krav kan ställas. Vi kommer att undersöka saken och eventuellt ta det med till nästa kriteriegeneration.

O3 Sustainable raw materials

Novozymes A/S

We are very happy to see that a lower limit of 1% has been introduced. We find that this is a very proportionate approach as it will significantly reduce the complexity and administrative burden of fulfilling declarations for complex mixtures added in small amounts to detergents, without adversely compromising the goals of increased sustainable sourcing.

Comments from Nordic Ecolabelling

Thank you for your support.

Lactips

”Renewable raw materials are defined as raw materials from biological material which are continuously renewed in nature within a short time span, for example grain and wood (European standard EN16575:2014).”

Amendments and new proposition: we think that is important to well define and make a difference between biological and organic raw material. Indeed it is not the same. For us, the biological means it comes from vegetable, animal or microbiologic and organic means based on an organic certified agriculture

Comments from Nordic Ecolabelling

Thank you for your comment. We of course agree that there is a difference between organic and renewable/biological raw material. As we do not require use of organic raw material, we consider our definition sufficient.

O4 Certified raw materials from oil palms

Kosmetik- och Hygienföretagen

Vi är positiva till att RSPO bibehålls som en möjlighet för att uppfylla kraven. Det är även positivt att en avgränsning för ingående ämnen över 1 % införs.

Comments from Nordic Ecolabelling

Tack för stödet.

BlueSun Consumer Brands S.L.U

Thank you for accepting RSPO certified mass Balance, Segregated or Identity Preserved.

Comments from Nordic Ecolabelling

Thank you for your support.

4.2.3 Requirements in section 3 Requirements for constituent substances

O5 Classification of ingoing substances

Novozymes

We accept that sensitizing preservatives can no longer be added to enzyme products used in ecolabelled detergents. We have also over the past years demonstrated that non-sensitizing alternatives (e.g Phenoxyethanol) can be used where preservation is needed.

Finally, we ask that Nordic Ecolabelling very soon starts to consider how to view the coming classification of Titanium Dioxide as suspected carcinogen by inhalation. Most enzyme granulates today contain Titanium Dioxide. We can however make Titanium Dioxide free alternatives, but production and supply etc. cannot be shifted overnight. On the very day the new classification is adopted by our supplier, Titanium Dioxide would be out of Nordic ecolabelling from one day to the next under current criteria – with no transition period. It would therefore be very helpful if we get an early public indication which way Nordic ecolabelling is leaning on this topic (which will affect almost all ecolabelled powdered detergents on the market today) – simply in order to better prepare.

Comments from Nordic Ecolabelling

Thank you for your support.

As the classification proposal for titanium dioxide is finally out of European Commission, we agree that we need to discuss where we'll stand and will take this discussion this autumn and communicate it to all stakeholders.

BlueSun Consumer Brands S.L.U

“Preservatives in enzymes no longer exempted” – Does this mean that the enzymes cannot contain a preservative classified as H317?

Comments from Nordic Ecolabelling

Yes, it means that. We have received information that this is possible and therefore want to advance the use of these enzymes with a better profile.

O6 Prohibited substances

Microplastics

Kosmetik- och Hygienföretagen

Vi anser fortfarande att ett förbud för mikroplast enligt ECHAs definition är för tidigt att införa i Svanens kriterier. ECHAs skrivelse är fortfarande bara ett förslag, vilket kan komma att ändras, både gällande definitioner och omfattning. Förslaget är oklart gällande vilka polymerer som kan komma att omfattas och vad konsekvenserna i så fall blir. Branschen ser att det skulle kunna omfattas mycket mer än de mikrokorn av plast, ”microbeads”, som ursprungligen avsågs.

Om Svanen avser att förbjuda det som ursprungligen avsågs som mikroplast, det vill säga mikrokorn av plast, så ser vi det som en möjlig väg framåt, men detta bör då förtydligas i kriterierna. Mikrokorn av plast är på väg att fasas ut från tvätt- och rengöringsmedel. På några år har användningen minskat till hälften inom Europa men man har inte nått ända fram än.

ECHA har i sin rapport bedömt att en övergångstid på 5 år behövs för att formulera om produkter i tvätt och rengöringsbranschen för att klara ett eventuellt förbud enligt den föreslagna definitionen för mikroplast. Branschen anser att 10 år behövs för att helt fasa ut mikroplast ur produkterna, enligt den föreslagna definitionen. Därför är det inte rimligt att Svanen inför ett förbud enligt ECHAs definition i kriterier som börjar gälla om 1 år.

Att Svanen hänvisar till ECHAs working definition innebär att det kommer att bli en tolkningsfråga gällande vad som omfattas av begränsningen. Det är heller inte lämpligt att hänvisa till ”restriction proposal criteria in Appendix X” eftersom det inom kort inte kommer att finnas något förslag. Beslut väntas tas av Kommissionen under våren 2020, och då är det inte längre en ”working definition” eller ”restriction proposal” utan kommer att stå som en del i REACH.

Ett kriteriedokument ska vara helt tydligt för den som ansöker om godkännande. Alla osäkra och otydliga krav innebär ökad administration för både företag och handläggare på Svanen. Det vore mycket olyckligt om ett godkännande är beroende på vilken handläggare som bedömer produkten.

Vi anser att kravet är för tidigt att införas och därmed ska strykas.

Novozymes

We have nothing in the way of requests for changes to this criterion, other than to repeat our comment that it appears that this ban will hit liquid detergents and powdered detergents differently, as the exact same soluble polymer can be accepted if dissolved in a liquid detergent, while being banned in its particle form within a powdered detergent.

A natural (but granted, more ambitious) step would be for Nordic ecolabelling to simply ban all non-biodegradable synthetic polymer ingredients, even if they happen to be dissolved in the detergent as sold, thus providing the same “equal playing field” for both powdered and liquid detergents (and thus promote the same innovation into biodegradable solutions).

Background to requirement O3 Prohibited substances

We would like again to briefly comment on this part of your background text:

“Microplastics can (...) be used as (...) enzyme encapsulation (30- 5000µm).”

Enzyme granulates from Novozymes are encapsulated with both an inorganic salt coating and a ‘wax’ coating. The wax is a readily biodegradable polymer so does not meet the definition of Microplastic. Other common polymers in enzyme granulates are natural, like cellulose or dextrin, and they also do not meet the definition of Microplastic.

Kosmetik- og hygiejnebranchen

The proposed draft restriction from ECHA considers that all solid polymer particles below 5 mm are (micro)plastics due to their supposed persistency. More precisely, the Annex XV restriction report states that *«The intent of the proposed restriction is not to regulate the use of polymers generally, but only where they meet the specific conditions that identify them as being microplastics»*. However, although all plastics are polymers, not all polymers are plastics (including microplastics). The ECHA Annex XV report does not provide a clear evidence supporting the above assumption, i.e. that all solid polymers are automatically a (micro)plastics).

In addition, accepted international definition for “plastic” (ISO 472) and the upcoming definition for “microplastics” under finalization by ISO/TC 61/SC 14/WG 4 “**Solid plastic particles insoluble in water with any dimension between 1 μm and 1 000 μm (= 1 mm)**” have not been considered in the proposed definition. As a result, the proposed restriction has the potential to target hundreds of polymers and substances that are not linked with ‘plastic’. For instance, according to the proposed definition, a modified cellulose particle is also considered a microplastic.

Microplastics should be defined in terms of “plastic”, or otherwise more narrowly defined in terms of the properties which potentially cause the concern.

Given these considerations, we propose the following definition for microplastic particles: “Microplastic particles: water-insoluble solid plastic particles with a size less than 5mm that can be found as aquatic litter”

Transition period

ECHA has estimated that a transition period of 5 years is needed to rephrase products in the laundry and cleaning industry to meet a possible ban under the proposed definition for microplastics. Therefore, it is not reasonable to introduce a ban according to ECHA's definition with shorter transition time than this.

Still, we see no reason to include ECHA's definition of microplastics in the new criteria since the regulation of microplastics at EU level is expected to enter into force from 2021.

Orkla Home&Personal Care

OHPC støtter innspill fra andre i bransjen her. ECHA sin definisjon på mikroplast er fortsatt et forslag og er under utarbeidelse. OHPC mener at det er for tidlig for Svanen å innføre et forbud for mikroplast i henhold til ECHAs definisjon nå, og bør heller innføres når definisjonen er bestemt. Dette for å unngå tolkninger pga uklarheter

Comments from Nordic Ecolabelling

Thank you for the comments.

Ecolabels should set stricter requirements than legislation and ecolabel only the best products on the market. Phasing out microplastics before legislation requires it is essential. The requirement can be deleted when the legislation has reached the same level with ecolabels.

Nordic Ecolabelling believes that it is important to use terms and definitions that are accepted and widely used in society. Furthermore, Nordic Ecolabelling believes that it will help license holders and potential applicants if they begin to phase out microplastics before it is mandatory, and then it is important that Nordic Ecolabelling uses the same definition that will be used in the legislation.

However, Nordic Ecolabelling is aware that referring to ECHA's working definition is problematic as that definition is not yet final.

Since the Nordic Ecolabelling believes that it is important to focus on phasing out microplastics, they are prohibited in criteria for detergents. However, the Nordic

Ecolabelling has chosen to use the definition used in the EU Ecolabel criteria for chemical products and in the Nordic Swan Ecolabel criteria for dishwashing detergents and detergents.

When ECHA's definition is published, the Nordic Ecolabelling assesses whether it is possible to introduce it to the criteria and if a transition period is needed.

Lactips

“Microplastics* * Microplastics are defined according to Echa’s working definition: material consisting of solid polymer-containing particles, to which additives or other substances may have been added, and where $\geq 1\%$ w/w of particles have (i) all dimensions $1\text{nm} \leq x \leq 5\text{mm}$, or (ii), for fibres, a length of $3\text{nm} \leq x \leq 15\text{mm}$ and length to diameter ratio of >3 . Polymers that occur in nature that have not been chemically modified (other than by hydrolysis) are excluded, as are polymers that are (bio)degradable.”

Amendments and new proposition:

We reject this proposal because the definition and restriction proposed by ECHA is not yet validated and the public consultation is ongoing. As such, it may not be considered as a reference.

Moreover, we consider that ECHA proposal is a minimum restrictive scenario build to meet needs related to socio-economic impacts and risks assessment.

Nordic Swan label is considered as one of the world’s toughest and most recognized environmental certifications, as such, it should reflect more hard to please criteria to ensure customers that labelled products have to lower ecological impact possible.

In view of all the above it should be an obvious choice and a matter of common sense to prohibit the release in the environment of “intentionally added” materials, including microparticles, be it in soluble or insoluble form, when they do not respond to strict criteria. These criteria are inspired by the principles of Green Chemistry as put forward by Anastas, Warner et al.10:

1. Sourced from renewable resources (Principle 7),
2. Transformed only by physical processes, or by such ones which are in compliance with the principles of Green Chemistry (Principles 3 & 4),
3. Free from unwanted or harmful additives (such as, but not limited to, mutagenic, teratogenic and/or carcinogenic molecules and/or endocrine disruptors) (Principles 4 & 5),
4. Featuring a low aquatic toxicity (Principle 4),
5. Readily (bio)degradable in both aerobic and anaerobic conditions, OR readily ‘compostable home’ (Principle 10),
6. The (bio)degradation demonstrated by adequate and realistic methodologies (Principles 10 & 11); compostability test methods are to be defined,
7. Leaving no stable metabolites after degradation or composting (Principle 10).

Comments from Nordic Ecolabelling

Thank you for your support. Many of the above-mentioned principles are used in the Nordic Ecolabelling. It is e.g. set requirements on ecotoxicity and biodegradation of ingoing substances. Compounds that could be seen as microplastics must also fulfil these requirements.

In addition we choose to specifically mention microplastics on our list of prohibited list but as long as the ECHA working definition is not finalized we have chosen to refer to the definition used in EU Ecolabel criteria for detergents and cleaning products and Nordic Ecolabelling criteria for cleaning products and hand dish wash detergents. When ECHA's definition is published, the Nordic Ecolabelling assesses whether it is possible to introduce it to the criteria and if a transition period is needed.

Other comments

Miljø- og Fødevarerministeriet

- Nanomaterials. Det er Miljøstyrelsens vurdering, at "nano" ikke skal bruges som faredeklaration, da nano udelukkende fortæller noget om partiklers størrelse og ikke om deres egenskaber. Derfor vil det være mere hensigtsmæssigt at udelukke nanomaterialer ud fra en vurdering af de enkelte stoffer og ikke som en samlet nanogruppe.
 - o I forlængelse af Miljøstyrelsens kommentar bemærker MFVM følgende:
På siden om nanomaterialer/particles står der i første sætning: "*The greatest cause for concern is the use of nanoparticles, which can be released and thereby affect health and the environment.*" Der er behov for omformulering af denne sætning, da det lyder som om, at den største miljømæssige trussel (overhovedet) er brug af nanopartikler. Der kan evt. bare skrives "*A great cause for concern is the use of nanoparticles, which....*"
- PFC. På grund af deres persistens støtter Miljøstyrelsen op om et forbud mod PFC'er.
- Organic chlorine compounds. Det er positivt, at "Organic chlorine compounds" er blevet tilføjet til miljømærkekriterierne, da det er Miljøstyrelsens vurdering, at nogle stoffer, som f.eks. Triclosan, belaster miljøet og tilmed er unødvendige i detergenter.
- Microplastics. Miljøstyrelsen støtter op om et forbud mod mikroplastik i detergenter i tekstilvaskemidler.
- Endocrine Disruptors. Miljøstyrelsen har ikke kendskab til den kategorisering for ED-stoffer, som er omtalt i forslaget til miljømærkekriterierne. De omtalte EU-rapporter er fra 2002, og det kan derfor ikke udelukkes, at de er forældede. Miljøstyrelsen vurderer, at der er behov for en præcisering af dette miljømærkekriterie. Det er ikke klart, om der muligvis er tale om WHO's kriterier for ED, som indeholder en kategorisering. Under punktet "candidate list and SVHC...." fremgår det, at "and the requirement of classification and prohibition of endocrine disruptors". Miljøstyrelsen har ikke kendskab til en ED-klassificering. ED identificeres via ELOQ under SVHC, men der er ikke tale om klassificering. Desuden virker formuleringen "Siloxanes D4, D5 and D6 are excluded through this requirement." uklar. Miljøstyrelsen går ud fra, at det skal opfattes således, at Siloxaner ikke må anvendes, men kan nemt misforstås, så man får den opfattelse, at det godt må bruges.

Comments from Nordic Ecolabelling

Tack för stödet.

Vi omformulerar meningen i nano bakgrunden, tack för ert förslag. Vi är eniga att inte alla nanomaterial är skadliga eller oroväckande. Men på grund av försiktighetsprincipen då det fortfarande finns väldigt litet information om nanopartiklarnas miljö- och hälsopåverkan då det gäller tvättmedel är det mer meningsfullt att vid behov undanta nano som är tryggt att använda.

Vi ser också att vår bakgrundstext under SVHC-ämnen är oklar och har justerat den till "There is some overlap between the SVHC substances and other substances listed in this requirement or other requirements. E.g. SVHC substances are also addressed via the requirements on classification of the product (O2) and ingoing substances (O5); prohibition of PBT and vPvB substances (O6); and prohibition of endocrine disruptors (O6)."

Kategorierna av endocrine disruptors (EDs) som avses är de i EU-kommissionens prioriteringslista för EDs från 2007. I denna revision har vi lagt till hänvisning till BPR:s och PPPR:s vetenskapliga kriterier för identifiering av EDs, vilka baseras på WHO/IPCS kriterier. Efter remissen har vi utvecklat kravet.

Det stemmer som dere går ut fra, at det skal oppfattes således at siloksaner ikke kan anvendes

O9 Fragrances

Miljø- og Fødevarerministeriet

På detergentområdet er lovgivningen mindre restriktiv end lovgivningen på både legetøjs- og kosmetikområdet, mht. tilstedeværelsen af parfumestoffer. Derfor kan de to andre produktområder være en inspiration til miljømærkningskriterier for detergenter.

Kriterierne O9.c og d udvider O9.b med yderligere parfumestoffer. Flere af stofferne i O9.c og d er sensibiliserende og vil derfor efter Miljøstyrelsens opfattelse være omfattet af kriterie O9.b.

Kriterie O9.b er mere restriktivt end legetøjslovgivningen, idet der stilles krav om, at der ikke må være tilsat sensibiliserende parfumestoffer i en koncentration over 100ppm. I legetøj gælder dette forbud kun for udvalgte sensibiliserende parfumestoffer, mens en række parfumestoffer udelukkende skal deklareres, når de forekommer i en mængde over denne koncentrationsgrænse.

De foreslåede miljømærkningskriterier for parfumestoffer stemmer overens med svanens kriterier for "Rinse Of" kosmetikprodukter (0,01%), og dermed er grænsen 10 gange højere end grænsen for "Leave On" kosmetikprodukter (0,001%).

I svanens kosmetikkriterier er der ydermere et forbud mod parfume til spædbarns-, baby- og/eller børneprodukter. Set i lyset af, at det samme vaskemiddel typisk vil blive anvendt til hele familiens vasketøj inklusiv til familiens børn, kan det overvejes, om koncentrationsgrænsen bør nedsættes, så den svarer til "Leave On" for kosmetikprodukter (0,001%), eller om der skal være et påbud om, at produktet skal mærkes med "indeholder parfume", for på den måde bedre at beskytte børn mod parfumestoffer i vaskemiddel.

I forlængelse af Miljøstyrelsens kommentarer bemærker Miljø- og Fødevarerministeriet, at miljømærkede produkter burde være parfumefri, da parfume ikke har nogen rengørende funktion, og mange forbrugere har en forventning om, at miljømærkede produkter ikke indeholder parfume.

Hvis parfume tillades bør grænsen for deklarationspligtige- og allergifremkaldende parfumestoffer sættes til 0,001% på linje med kravet til leave-on kosmetik. Samtidigt anbefales det, at parfumeholdige produkter tydeligt skal deklareres på forsiden med ”Indeholder parfume”.

Comments from Nordic Ecolabelling

Tack för kommentarerna. Vi är eniga att parfymer ofta har tveksamma klassificeringar och är så klart inte nödvändiga till tvättresultat, men samtidigt vill en del konsumenter ha dem. Parfym ska alltid deklareras på innehållsförteckningen så det är lätt för en konsument som vill undvika parfymerade produkter att hitta ett oparfymerad alternativ. Många produkter deklarerar även parfymfritt på förpackning om inga parfymer ingår. Ett totalförbud mot sensibiliserande parfymämnen antas ge en betydligt mindre spridning på marknaden av Svanenmärkta tvättmedel och skulle då minska den totala hälso- och miljövinsten för miljömärkta produkter inom den här kategorin, eftersom många konsumenter efterfrågar parfymerade produkter.

Vi har redan idag strikta parfymkrav som är harmoniserade med våra kriterier till handdiskmedel, rengöringsmedel och rinse off kosmetika och vi hör från branschen att det är svårt att utveckla bra parfymer som uppfyller våra krav. Vi ställer bland annat en strikt gräns på sensibiliserande och miljöfarliga parfymämnen. I tillägg till de 26 deklarationspliktiga parfymämnen begränsar vi även 7 parfymämnen som blev identifierade i SCCS rapport 1459/11 med högst risk för sensibilisering och förbjuder 3 parfymämnen som rekommenderades att inte användas i kosmetiska produkter. I tillägg förbjuder vi även CMR klassade parfymämnen som Lilial och misstänkta hormonstörande parfymämnen som benzyl salisylat. Att skärpa kravet ytterligare till exempel via sänkning av nivåer till samma nivå som för leave on kosmetika ser vi inte som en möjlighet idag.

4.2.4 Requirements in section 3 Dosing, ecotoxicity and biodegradability

Lactips

“If the product is dosed as a unit containing a water-soluble foil intended not to be removed before washing, the foil must be considered to be part of the product formulation in requirements dealing with CDV, environmental hazards and aNBO and anNBO (O10-O13).

Amendments or reason to rejecting the proposal: We reject the proposal because of the status given to soluble wrapping films for laundry detergents. Such films should have the status of packaging or wrapping, not a status as a raw material of the laundry detergent product.

⇒ The soluble wrapping film for laundry detergent products is considered as a substance of the cleaning product itself in this document.

⇒ The aim of the soluble film is to wrap the laundry detergent product, to make an envelope in order to carry it, to dose it, to protect the hand of the consumer. It is entirely and exclusively a packaging.

⇒ The soluble film has no activity at the washing & cleaning level. We can affirm this because:

- If we look at the DID list, we don't find the "substance" to wrap cleaning products so it means it is not a detergent ingredient.
- If we look at the common uses of the soluble film commonly used to wrap concentrated cleaning products (PVA), we see there is no property of detergency, cleaning or washing. This is very well documented when looking at the most common PVA applications :
 - as an adhesive and thickener in latex paints, coated paper, hair sprays, shampoos and glues;
 - as a CO2 gas barrier in PET;
 - as the toy called putty or slime together with borax;
 - as a plastic membrane in sanitary napkins and incontinence products;
 - for the production of polyvinyl butyral (transparent and adhesive membrane for safety glass);
 - for release from the production of composite materials;
 - as a membrane in the hydropneumatic systems of Citroën;
 - as sails for wind mills and turbines, currently composed of 50% polyester and 50% PVA;
 - as a filament for 3D printers.

All these applications aim at the formation of a barrier, impermeable to gases and liquids, or aim at an increase of resistance, rheology or adhesion.

We suggest to change the status of the soluble wrapping film for laundry detergent products into a new status as "wrapping film" for example, with a specific definition and specific criteria to evaluate its biodegradation (aerobic and anaerobic), and its aquatic toxicity.

Comments from Nordic Ecolabelling

Thank you for your input. We agree with many of your comments. However, please note that the DID list is not an exhaustive list encompassing all detergent ingredients. Rules for calculating DID values for ingredients not on the DID list part A are provided in DID list part B. Furthermore, there are several other ingredients that are commonly found in detergents that does not have a cleaning ability (e.g. perfume, color). The fate of the water-soluble wrapping is comparable to other ingredients/substances from a detergent that enters the washing machine, in the sense that it will eventually be flushed down the drain and into the water treatment plant. Hence, we will continue to treat the water-soluble wrapping film as an ingredient in the context of Nordic Swan Ecolabelling

O10 Maximum dosage

Dansk Vask-, Kosmetik- og Husholdningsindustri and Nopa Nordic

Dosage for middle and hard water: Ved brug af pods ønsker vi at kunne differentiere doseringen ved blødt og middelhårdt vand, da det er disse vandhårdheder der er mest udbredte i de nordiske lande. I den nuværende tekst er der kun angivet, hvad doseringen må øges med fra blødt til hårdt vand. Her vil vi gerne have tydeliggjort, hvad doseringen må øges med fra blødt til middelhårdt vand. Vi vil foreslå følgende model ved brug af to pods: Blødt vand: 2 pods, Middelhårdt vand: 3 pods, Hårdt vand: 4 pods eller Blødt vand: 2 pods, Mid-delhårdt vand: 3 pods, Hårdt vand: 3 pods.

Dosage for lightly or heavily soiled textiles (heavy-duty detergents): Ved brug af pods vil vi gerne have specificeret doseringen ved let snavset tøj. Vi vil foreslå følgende model ved brug af to pods: Normal snavset tøj. 2 pods, Let snavset tøj: 1 pod, Meget snavset tøj: 3 pods.

Vi vil gerne have indskrevet, at den dosering som benyttes i funktionstesten, er den laveste dosering, som kan angives i doseringsvejledningen ved 3-5 kg og normal snavset tøj. På denne måde sikrer vi, at der er lige vilkår for alle. De udfordringer vi har set med brug af ekstra blødt vand og en anden inddeling af intervallerne for vandhårdhedsgrader i doserings-vejledningen på norske produkter, vil dermed kunne elimineres.

Comments from Nordic Ecolabelling

Nordisk Miljömärkning tackar för deres innspill. Vi har justert de tillatte doseringer av pods i lys av deres forslag.

Funksjonstesten gjør det mulig å sammenligne/benchmarke produktene ved standardiserte betingelser, for derigjennom å sikre en viss, objektiv, effektivitet. Vi mener at standardiserte doseringsbetingelser oppnås på en hensiktsmessig måte som beskrevet i starten av kapittel 4: «The requirements in this chapter are based on the recommended dosage at 5.5°dH, i.e. the reference dosage. This is also the reference dosage used for testing the performance according to the Nordic Ecolabelling criteria». I en reell brukssituasjon vil dog flere andre faktorer spille inn på produktenes ytelse, heriblant vannhardhet som dere nevner (men også type tekstiler, vasketemperatur, besmutningsgrad, smussammensetning, vaskeprogram, fyllingsgrad i maskinen etc.). I hvilken grad en test korrelerer med virkelig vaskeresultat vil sannsynligvis variere både på grunn av variasjoner i de reelle vaskebetingelsene, og også i forhold til testdesign. Merk at det vurderes et eget prosjekt på testdesignet (revisjon av effektivitetstesten) utenom denne kriterierevisjonen.

O12 Critical dilution volume (CDV)

Lactips

”CDV is calculated using the following formula for all substances in the product:”

Amendments or reason to rejecting the proposal: We reject the proposal because the soluble wrapping film for laundry detergent is included in the calculation of CDV. We think that the biodegradation (aerobic and anaerobic) and the aquatic toxicity of the soluble film should be evaluated separately.

The soluble wrapping film for laundry detergent represents between 2 to 3% of total weight of the laundry detergent product. It means that if the soluble film is not readily biodegradable in aerobic or anaerobic conditions, that fact would not have an impact on the CDV of the laundry detergent product.

It means that a soluble film with a higher toxicity in water, and/or with a poor or non-existent biodegradation, won't constitute a warning and won't prevent to get the label.

In the REACH regulation, the percentage of SVHC (Substance With Very High Concern) used to be lower than 0.1% (weight/weight) in the entire article. Since 2015, the ECHA (European Chemical Agency) changed the way to make the calculation in

order to ensure that there is no SVHC concentration in the different components of the articles. It means that actually the percentage of SVHC has to be lower than 0.1% (weight/weight) for each component that is part of the product.

We suggest to do the same for the calculation of the CDV. The idea would be to make the calculation on the laundry detergent product, and separately the calculation on the soluble wrapping film of the laundry detergent product, in order to ensure that the soluble film won't contribute neither to the bioaccumulation of plastic in water, nor to the eutrophication of the water system.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. However, please note that the current CDV approach effectively limits the overall discharge of components that are either poorly biodegradable or with a certain aquatic toxicity. Please also note that not aerobically biodegradable substances are also limited in requirement O13.

O13 Biodegradability – aerobic and anaerobic (aNBO and anNBO)

Lactips

"If substances are not on the DID list, or data on the DID list is lacking, the related documentation must be submitted."

Amendments or reason to rejecting the proposal: We reject the proposal because we think that it is necessary to demonstrate with tests all results for each products. In the literature you can find different information about the biodegradability of product for example, but it can be performed with others methods not mentioned in the referential. It is necessary to demonstrate all results with test mentioned in the referential.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. Please note that Nordic Ecolabelling accepts only certain, specified test methods. See DID list part B on <http://www.nordic-ecolabel.org/product-groups/group/?productGroupCode=006>

O14 Dosage instructions

Miljø- og Fødevareministeriet

Der er ikke længere krav om, at flaskelåget til dosering ikke må være større end den anbefalede dosis detergent til blødt vand. I de tidligere miljømærkekriterier blev der argumenteret for, at større låg resulterer i, at mange forbrugere overdoserer detergenter. Generelt anbefaler Miljøstyrelsen ikke at bruge unødvendigt store mængder detergenter ud fra et ønske om at skåne miljøet. Det vil derfor være u hensigtsmæssigt at slette kriteriet, hvis det fører til, at forbrugere ofte overdoserer vaskemidlet.

Comments from Nordic Ecolabelling

Nordisk Miljömärkning tackar för deres innspill. Kriteriet er slettet fordi vi har fått tilbakemelding fra flere produsenter om at investeringen og den kompleksiteten i produksjon/logistikk som egne korker til de Svanemerkede produktene ville medføre blir uforholdsmessig stor. Belastningen med kravet er følgende vurdert for stor i forhold til den potensielle miljønyten.

Varefakta

We have also noted the changes for Dosage instructions in O14 and support the demand. And we note the reduced requirement for Washing guidance on packaging O15.

Comments from Nordic Ecolabelling

Thank you for your support.

BlueSun Consumer Brands S.L.U

~~The cap size shall not exceed the recommended dosage for one normally soiled wash load at soft water.~~ - Thank you for deleting this requirement!!

Comments from Nordic Ecolabelling

Tack för stödet.

KiiltoClean Oy

b) For liquid products contained in a conventional bottle it must be possible to use the closure as a dosing device. (This does not apply for products that are intended for auto dosing machines only.) A scale on the closure as well as a picture on the label is required.

- *We propose that it is enough to present a picture of the closure and volume of the closure in the label. It is very difficult to add additional scale inside the closure so that consumer would also see the scale. The difficulty comes from the fact that cap manufacturer is not necessarily willing to make changes to the mold, or it will cost too much. The volumes in cap production are enormous.*

c) For products that does not have a cap of sufficient volume to be used as a dosing device (eg a squeeze bottle or a carton for liquids) a dosing scale on the bottle/carton is accepted. The bottle/carton should be designed so that the detergent can conveniently and accurately dosed.

- *We do not see, how dosing scale can be used in liquid cartons. Cartons are non-transparent. We propose that cartons are included under point d).*

Comments from Nordic Ecolabelling

We agree that the scales on some of the current closures can be somewhat difficult to read, but nevertheless, a scale in combination with a picture will facilitate the dosing more than either a scale or a picture alone. A dosing scale in liquid cartons is widely applied on e.g. milk cartons in Norway and is not obligatory but given more as an example in the requirement, this is specified in the requirement.

O16 Recycling guidance on packaging

Kosmetik- och Hygienföretagen

Det är positivt att Svanen har anammat synpunkter gällande text för sorteringsanvisningar som ska skrivas på förpackningarna. Det är redan idag brist på plats för all information som ska finnas på förpackningarna. Sorteringsanvisningar kan också skilja sig åt mellan olika länder och regioner varför det blir svårt att ha en gemensam nordisk information i textformat.

Comments from Nordic Ecolabelling

Tack för stödet.

Diversey

Can you provide a list of conditions for the recycling for the Nordic countries ? or share a source we can consult ? As space is limited, even with just using icon, it could be a challenge to fit each of them on the labels, also when the product is sold in other European countries, reducing even more the space available.

Comments from Nordic Ecolabelling

Thank you for comments. We understand the problem with the space. However, as we overuse our resources it is important to promote and encourage recycling to reduce use of virgin raw materials. In Norway, Finland and Sweden such packaging is sorted as plastics or cardboard and this should be made clear to users. Such system is also being developed in Denmark. We therefore choose to keep the requirement.

Varefakta

We fully appreciate and support the good intentions regarding O16 Recycling guidance on packaging. But we must also point out the difficulties regarding the requirements for labelling. As others has also pointed out, there is not yet a uniform system for this kind of labelling. And we have a recycling industry that do not treat waste alike – in Denmark even from municipality to municipality. It would be a great help if more guidance on how to meet the requirement could be provided.

Comments from Nordic Ecolabelling

Thank you for comments. We understand that there is not yet a uniform labelling system and that the Danish waste collection system differs from other Nordic Countries. In Norway, Finland and Sweden such packaging is sorted as plastics or cardboard and this should be made clear to consumers in order to promote and encourage recycling that is important in reducing use of virgin raw materials. Such system is also being developed in Denmark. We therefore choose to keep the requirement.

BlueSun Consumer Brands S.L.U

It must be stated on the packaging how it should be sorted/recycled by the consumer in each Nordic country where it is sold. Text or symbols can be used. – [This Requirement is not viable, as it will be challenging to explain how each Nordic country recycles, also due to lack of space we have on our labels, currently most products sold to the Nordics countries have 4 languages on the Label. Maybe there could be an exception, to include the recycling instructions on our Website due to lack of space? We created the following Icon and will include it on our labels, will this be OK? It states that we need to separate and recycle.](#)



Comments from Nordic Ecolabelling

In Norway, Finland and Sweden such packaging is sorted as plastics or cardboard and this should be made clear to consumers in order to promote and encourage recycling that is important in reducing use of virgin raw materials. Such system is also being developed in Denmark. Nordic Ecolabelling sees that the icon above would work with addition of “plastics” or “cardboard” in the label.

O17 Claims on the packaging

Varefakta

Varefakta welcome the demands in O17 for Claims on the packaging.

Comments from Nordic Ecolabelling

Thank you for the support.

4.2.5 Requirements in section 5 Performance

O18 Fitness for use

Danish Consumer Council

The reference detergent seems quite outdated. For instance, only using one enzyme is very poor, and very far from the market in general.

Testing with soft water 5,5dH is also a very “light” test. Most Danish water is hard, and this means that the test does not reflect real life performance, and the detergent gives a poorer washing result with harder water.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. We agree that the reference detergent could be described as somewhat “outdated”. However, this formula is still widely used as a reference detergent in the market, not only for Nordic Swan Ecolabelling but for several other standards. The aim of the test is to define an appropriate level of performance in a standardized way. When/if the reference is updated, Nordic Ecolabelling will adjust to that. Furthermore, please note that Nordic Ecolabelling is considering whether a new test standard should be developed. If so, that will be run in a separate project.

As most Nordic countries have soft water, we require testing in soft water. We understand that this is not ideal in Denmark.

BlueSun Consumer Brands S.L.U

I have seen that the following paragraph has been deleted:

~~Exceptions to the above requirements~~

~~Nordic Ecolabelling may possibly grant exemptions from the requirements for re-testing of efficiency if minor changes are made to the composition of the product during the period of validity of the license which will not impact the overall performance.~~

~~Reasoning for the exemption must be submitted by the applicant and approved by Nordic Ecolabelling in accordance with Appendix 7. See also appendix Nordic Ecolabelling Performance Test concerning the requirements applicable to test institutions.~~

~~Nordic Ecolabelling will consider whether the documentation provided in accordance with the appendix 7 Nordic Ecolabelling Performance Test is sufficient for an exemption to be granted in the individual case. Reasoning and documentation as provided for in the appendix 7 Nordic Ecolabelling Performance Test.~~

Does this mean that for each minor change we do on the formula we will need to redo the performance test? We recommend that there be some exceptions, because there are changes that don't affect the performance of the formula and it wouldn't make sense to redo the test, as it costs a lot of money. It would be great if we could define a list of changes that would lead to a new performance test.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. Minor changes in the formula, that obviously don't affect the washing performance, will still not require a new performance test. However, we don't find it necessary to specify that in the criteria document. This is in line with today's practice in other comparable Nordic Swan Ecolabelling criteria (such as Dishwasher detergents, Hand dishwash detergents and Cleaning products).

4.2.6 Requirements in section 6 Packaging

Faerch Group A/S

In the beginning of Section 7 it says:

“Nordic Ecolabelling wishes to set strict requirements on packaging to ensure optimal possibilities for recycling”,

and further, in criteria O19, on Recycling and recycled material in packaging”, it says:

“It must be possible to recycle the main materials in primary packaging* in today's existing material recirculation systems in the Nordic countries. “

Faerch understand that Nordic Ecolabelling wishes to support the development of a circular economy for plastics and specifically promote the use of recyclable packaging for laundry detergents and stain removers.

Faerch fully support these goals, however in order to meet them, we strongly believe Nordic Ecolabelling has to make the following revisions to section 7:

- 1) All references to recycled PET (whether postconsumer or commercially recycled) must be removed from section 7.
- 2) It must be a stated requirement that hard packaging for laundry detergents and stain removers under no circumstances must be made from PET.

We believe the above revisions are mandatory because laundry detergent and stain remover bottles are not recyclable in existing PET recirculation systems. Instead such packaging represent one of the more challenging sources of contamination of the existing PET recycling stream.

This is further explained in the below:

No collection, sorting or delivery systems are available for recycling of the “non-food” PET fractions.

As a consequence PET packaging for laundry detergents or stain removers cannot be claimed to be “recyclable” according to ISO 14021, section 7.7.

All existing collection, sorting and mechanical recycling systems for PET are designed for recycling of PET food packaging.

PET packaging from “non-food uses” may be manufactured from substances non-authorized for food packaging. In addition, unwanted chemicals from the non-food consumer products may be absorbed into the packaging. Therefore European food laws consider “non-food” post-consumer PET as a potential safety risk to the consumer and “non-food PET” must not be intentionally added during the production of recycled PET intended for the manufacture of food contact materials.

In accordance with the requirements prescribed in (EU) Regulation 282/2008 and EFSA’s criteria for safety evaluation of mechanical recycling processes (EFSA Journal 2011;9(7):2184) the recycling facilities actively seek to remove “non-food PET” from their input stream. EFSA’s criteria specify the limit for nonfood PET containers in the post-consumer input stream as 5%.

In the Nordic countries the majority of post-consumer PET for recycling is collected through deposit systems. A laundry detergent or stain remover bottle made from PET will therefore be rejected already at the point of collection and will only turn up in the recycling stream “by accident” (if the rejection mechanism in the bottle refund machine is not working properly).

Due to increasing demands for recycled PET for food packaging, European recyclers are working on the development of recycling systems for post-consumer PET from curbside collection systems. The sorting out of “non-Food” PET from PET collected from curbside systems represent a real challenge. The existing automatic sorting systems cannot distinguish between food and non-food containers. The sorting systems are typically NIR (Near Infrared) detection/sorting systems which sort the materials according to polymer type and/or colors.

A requirement for non-coloured non-food bottles (as proposed in O20) will deprive the recycling industry of the opportunity of sorting based on colors. A non-colored “non-food” PET bottle will inevitably end up in the clear “food packaging”-fraction.

Contamination with “non-food” packaging and the associated potential contamination with unwanted chemicals represent a real threat to the existing PET recycling industry.

Therefore an Ecolabelled laundry detergent bottle made from PET is not a resource for recycling.

On the contrary, if the proposed criteria comes into effect, Ecolabelled laundry detergent and stain remover products will represent a direct source of physical and chemical contamination of the existing PET recycling stream.

In conclusion, the intentional introduction of “non-food” PET packaging proposed for the updated Nordic Ecolabelling criteria is contraproductive to further development of a circular economy for PET.

A laundry detergent bottle made from PET is not recyclable according to the ISO 14021 definitions but is instead a de facto contaminant of the PET recycling stream.

Faerch therefore strongly urge Nordic Ecolabelling to reconsider their proposal and instead actively work to prevent that packaging for laundry detergents and stain removers are made from PET.

Comments from Nordic Ecolabelling

Thank you for your comments. The situation you describe is not reality for all of the Nordic Countries. In Sweden, Norway and Finland non-food PET is also recycled and used in production of new PET products.

We therefore keep the requirement and refer to PET as well as we believe that it is important to promote the reuse of non-food Pet as well.

Miljø- og Fødevarerministeriet

019. Dokumentationskravet beskriver, at det er licenshaveren, der skal definere hvordan emballagekomponenten genanvendes, hvorimod emballageproducenten kun skal deklarerer materialet i emballagen. Det vil typisk også være emballageproducenten, der kan beskrive hvordan emballagen bedst genanvendes.

Nordisk Miljømærkning opfordres til at tage op til overvejelse, hvorvidt PET skal kunne anvendes til emballage, eller at der i det mindste er krav om, at fødevarer godkendt PET (fx fra det danske pantretursystem) ikke må anvendes. Et krav om, at der ikke må tilsættes pigment til PET kan risikere at virke modsat intentionen. Hvis emballageproducenten ikke må tilsætte pigment til genanvendt (og typisk uklart) PET for at få en ensfarvet emballage, kan der opstå den situation, at emballageproducenten (eller licenshaveren) i stedet kun anvender klar PET, fx fra særskilt indsamlet PET-fødevareremballage. Svanens krav kan dermed ende med at være uhensigtsmæssigt, der bruger af god kvalitet og klar PET-emballage, der kunne være anvendt til godkendt fødevareremballage.

Comments from Nordic Ecolabelling

Tack för kommentarerna. Vi behåller kravet att licensinnehavaren ska definiera hur förpackning ska återvinnas. De kan behöva hjälp från deras underleverantörer för att kunna göra det, men det är bara dem som kan skriva instruktioner på etiketten. I bilagan för förpackningsleverantören (bilaga 4) ställs den frågan också (How should the packaging component be recycled? (E.i. as paper, cardboard, plastic packaging) (O19))

Angående PET från pantretursystem har vi bestämt att inte införa ett förbud.

Det finns idag ingen efterfrågan för färgad PET efter återvinningen och oftast går det till rejekt i återvinningsanläggningar, alltså bränns. Vi vill inte främja användning av ett material som inte materialåtervinnas och därför väljer vi att behålla kravet på ofärgad PET. Kravet kan ändras om situationen på marknaden ändras. Vi lägger dock till att om återvunnet material används och om den har färg som härstammar från återvunnet granulat, får den användas.

O19 Recycling and recycled material in packaging

BlueSun Consumer Brands S.L.U

All hard/rigid plastic packaging must contain minimum ~~75~~ 50 % (by weight, calculated on total mass of the bottle/box/container, closure and label) post-consumer/commercial recycled material (PCR)**. – Thank you for reducing the PCR %!! This new requirement is viable.

Comments from Nordic Ecolabelling

Thank you for your support.

Kosmetik- og hygiejnebranchen

Our members have identified following challenges regarding the subject 'Recycling and recycled material in packaging'.

- 1-year implementation for new packaging material is very short. In average it takes a company 2-3 years to develop new packaging material as this may also require massive investments at their factories.
- Post-consumer recycled material (PCR) plastic can contain higher percentages of impurities
- Content of PCR will depend on thickness of the tube and bottle. One would argue that it may be easier to increase PCR in a thick bottle compared to a thin bottle.
- Properties of a bottle might change when using PCR materials.
- The quality of PCR. Each batch of PCR have different qualities and contain different hazardous chemicals which potentially can migrate from the packaging and potentially be an exposure to the consumers.

Comments from Nordic Ecolabelling

Thank you for your comments. We understand the challenges. But we also see it as our task to stimulate both recycling and the use of recycled materials in packaging as there are clear environmental benefits in them.

We have also seen considerable developments in the field over the past couple of years. E.g. in Finland has sorting of plastic grown 59% from 2017 to 2018 and the figure is expected to grow again this year. Thus, there is more and more recycled plastic and be different quality fractions of PCR in the market. The plastics industry throughout Europe is working on the matter as it is the EU's goal that 55% plastic will be recycled in 2025. However, collection of plastics is not enough, plastics should be reused as well.

We believe that these challenges can be overcome but wish to continue dialogue with our license holders during the transition period that will be longer than normal in order to give time to find solutions.

Kosmetik- och Hygienföretagen

Tillgången på återvunnen råvara av god kvalitet är inte heller säkerställd. Det är mycket viktigt att förpackningarna klarar kraven på säkerhet och hållbarhet även när mängden återvunnet material ökas. De föreslagna kraven på återvunnen råvara i förpackningarna är fortfarande ett mycket stort steg att införa, särskilt som det endast är ett års övergångstid för de nya kriterierna. Vi bedömer att det är mycket viktigt att återkoppla med licensinnehavarna för att se vilka krav som är möjliga att uppnå.

Comments from Nordic Ecolabelling

Tack för kommentaren. Vi förstår utmaningarna med användning av återvunnet material. Men Miljömärkning ser det också som sin uppgift att stimulera både återvinning och användning av återvunna material i förpackningar eftersom det

finns tydliga miljöfördelar i dem. Vi har också sett en stor utveckling på området under de senaste åren och tror därför att dessa utmaningar kan övervinnas under övergångsperioden. Vi kommer dock fortsätta dialogen med våra licensinnehavare under övergångsperioden

KiiltoClean Oy

All hard/rigid plastic packaging must contain minimum 50 % (by weight, calculated on total mass of the bottle/box/container, closure and label) postconsumer/commercial recycled material (PCR)**.

- *We understand the idea behind this requirement and we would like to support it, but: This is too difficult demand. Percentage required is too high since there's not yet enough PCR available for all the manufacturers. Also it's difficult to find good enough quality PCR for the detergent packages. It could be that large manufacturers reserve all available material and smaller ones are left without possibility for the PCR material. We propose that the requirement for PCR content is removed-*
- *There could be technical problems with closures made from PCR since mechanical properties of closures needs to be better than the rest of the package. Weight of the closure is small compared to rest of the package so we propose closure is left out from this demand and calculation.*

Comments from Nordic Ecolabelling

Thank you for your comments. We understand the challenges. But we also see it as our task to stimulate both recycling and the use of recycled materials in packaging as there are clear environmental benefits in them. We have also seen considerable developments in the field over the past couple of years and therefore believe that these challenges can be overcome during the transition period. However, we also want to continue dialogue with our license holders during the transition period that will be longer than normal in order to give time to find solutions.

RB

- RB is committed to using plastic responsibly and contributing positively to the circular economy. We will reduce plastic wherever possible and replace it with alternative materials that can deliver a more sustainable solution to the environment. Where we will continue using plastic, by 2025 100% of our packaging will be recyclable or reusable and we will include at least 25% of recycled plastic in our packaging where possible and as allowed by regulators. More details on our approach can be found on <https://www.rb.com/responsibility/plastics-packaging-and-waste/plastics/>.
- There should be a balanced approach which takes into account minimizing plastic packaging, ensuring recyclability and including recycled plastic.
- Changes to new alternative packaging materials such as increasing PCR takes time and therefore it is important that you consider a stepwise approach and not just 12 months to implement major new changes. The possibilities to increase PCR will depend on the bottle/container material, design and formula aggressiveness – and all of these need to be tested for compatibility with further validation to identify and make changes to production lines where needed. The implementation time could vary from 1-3 years depending on the complexity of this change.

- The quality of PCR is another factor that you need to consider. It is still early days, but we know that each batch of PCR has different qualities and may contain some hazardous chemicals which potentially can migrate from the packaging and pose a risk to the consumer. This should be reviewed in line with the stringent requirements the Swan has in relation to impurities in the chemical mixture.

Comments from Nordic Ecolabelling

Thank you for your comments and a further dialogue with us. We have considered your input thoroughly. Our job is to push producers to environmentally better products. We believe we have a balance between minimizing plastic packaging, ensuring recyclability and including recycled plastic. We have witnessed considerable improvements in the plastics recycling (both in quality and amounts) in the recent years and have indications that this will continue in a more rapid pace. The Ecolabelling criteria needs to be in the frontline and separate the best products on the market and to do this we have decided to keep the requirements with small adjustments. We will look into chemicals in recycled plastics in our coming criteria revisions and possibilities to set requirements on those if they prove to be a risk. We wish to continue dialogue with our license holders during the transition period that will be longer than normal in order to give time to find solutions.

Nopa Nordic

- Paper/cardboard-based packaging must contain minimum 90% PCR.

Det er forskelligt fra format til format hvor højt op vi kan gå i genbrugs procenten. Da emballagen konstrueres ud fra at skal have en vis styrke kan vi ikke gå på kompromis med dette. I dag ser situationen sådan ud:

- 0-2 kg. 100%
- 2-5 kg. 75%
- 5-10 kg. 56%
- 10- op efter 90%

Vi er dog blevet i tvivl om ovenstående % er for PCR eller for PCR + andet genbrugspap/papir. Vi kommer tilbage så snart vi har et svar fra vores leverandører.

Comments from Nordic Ecolabelling

Tack för input. Vi har ändrat gränsen för corrugated board, men inte för de övriga kartongförpackningarna.

O20 Design for recycling of plastic packaging (except pouches)

Kosmetik- och Hygienföretagen

Vi anser att krympfilm ska få användas för mer än 60 % av ytan om det finns tydliga instruktioner för hur man separerar den från övriga förpackningen. Eftersom det redan idag är brist på plats för information på förpackningen är det i de flesta fall inte möjligt att reducera krympfilmen till 60 % av ytan. Det bör finnas ett alternativ att använda större yta om filmen separeras från förpackningen innan den lämnas till återvinning. Flera parter har kommenterat detta i den första remissen, men olyckligtvis har Svanen inte tagit till sig av dessa kommentarer. Vi bedömer att många produkter kommer att välja bort Svanenmärkning på grund av detta krav.

Vi har tyvärr inte något bra sätt att definiera mörka kulörer.

Vi vill understryka vikten av att diskutera förpackningskraven med licensinnehavarna och inte enbart med förpackningsåtervinnare. De krav som föreslås innebär stora kostnader och förändringar för licensinnehavarna. Vi rekommenderar att krav införs stegvis.

Comments from Nordic Ecolabelling

Tack för era kommentarer. Vi har haft dialog med flera instanser under revisionen, bland annat fick alla licensinnehavare frågor om förpackningar innan första delremiss och vårt förslag var delvist baserat på de svar som vi fick. Alla licensinnehavare har fått del- och slutlig remisser, blivit inbjudna till ett remisswebinar och vi har haft ytterligare mejlkorrespondens samt möten med de licensinnehavare som har önskat att bidra mer.

Angående krympfilmetiketter så har vi valt att behålla förbudet med PET-G. PET-G är ett material som stör återvinning av PET och alternativa material borde undersökas och börja användas. Det är miljömärkningens jobb att stimulera marknaden på detta sätt. Alternativet att be konsumenterna att separera en film från förpackning innan den lämnas till återvinning är inte en lösning då återvinning ska vara så enkelt som möjligt så att så många som möjligt gör det.

Auraprint

PET-sleevers and PET-bottles

The criteria for the Nordic Swan ecolabel for laundry detergent is developing to be challenging for sleevevers. According to the new criteria, the Joutsenmerkki does not accept a PET-sleever as a label if the sleevever covers over 60% of the package. Not even if the bottle itself is PET. The grounds for this are as follows: "PET-G labels/shrink film labels are excluded since PET-G is problematic in recycling and is not compatible with A-PET."

We are trailblazers in recycling here in Finland and the Nordics. Our aim is to create as much high-quality material for recycling as possible, whereas in many other European countries recycled PET goes to a lower category of use (not from a bottle to a bottle, or even to use in food industries) or into incineration.

Elsewhere in Europe the problem is understood, but there the use of PET-sleevers continues normally, until a replacement material can be found. This week we have been in contact with Italian, French, German and Dutch sleevever suppliers, who supply constant large volumes of PET and PVC sleeves for food and detergent packaging where the bottles are made from PET materials. These products end up in Finnish stores to compete with products made in Finland. The reason for PET sleevever materials is that there is no available replacement material in the market. For example, the material offered by UPM Raflatac a few years back would be the kind you are wishing PET bottles to have:
<http://www.upmraflatac.com/emea/en/news/details/shrink-sleeve-label-recycling-study>

Raflatac stopped developing the PO sleevever and the product itself, because there was no demand for it in the market.

We in Finland do a good and valuable work in recycling and it is great that issues such as this one are being monitored and regulated. I still fervently wish that us Finnish producers would be within the same regulations as our competitors in Europe. Regrettably this is currently not the case. Almost all detergent in store shelves are labelled with sleeves, and all use PET or PVC as material. If Finnish companies cannot use PET sleeves, it creates a skewed competition situation, because foreign companies may use sleeves to create flashier and more appealing packages.

Palpa has given some Finnish companies a special permit to use PET sleeves in PET bottles for now, until a replacement material can be found. As a Finnish producer of labels, we hope that the Nordic Swan ecolabel will do the same.

Comments from Nordic Ecolabelling

Thank you for your comments. Nordic Ecolabeling is a Nordic label and the same requirements apply in all of the Nordic countries. We have decided to keep the requirements as we believe that it is Nordic Ecolabelling's job to stimulate the market to a more sustainable and environmental friendly direction. And less PET-G in recycling of PET has an environmental benefit.

KiiltoClean Oy

PET-G (polyethylene terephthalate glycol-modified) cannot be used in labels/shrink-film labels

- *We have an understanding that NIR-technology can recognize PET-G as PET material and therefore PET-bottle is identified correctly.*
- *To our knowledge there are no other well functioning material for shrink-film labels that would fit the Nordic Swan criteria. Using this restriction will place products in a different competitive position. Products without Nordic Swan (that will use PET-G shrink-film labels) will stand out and be more attractive to consumers. Layout is still one of the most important buying decision criteria for consumer. We propose that PET-G material could be used in shrink-film labels and there has to be perforation in the shrink-film label material that helps consumer to remove the label. Also instruction has to added to the label informing that shrink-film label has to be removed before recycling.*

Comments from Nordic Ecolabelling

Thank you for your comments. It is correct that NIR detects PET-G as PET, but the problem is that PET-G and PET are different material and large quantities of PET-G disturb the recycling of PET. It is Nordic Ecolabelling's job to stimulate the market to a more sustainable and environmentally friendly direction and this we can do by excluding the use of PET-G.

The option of asking consumers to separate the label from packaging before it is returned to recycling is not a solution as recycling should be as simple as possible so that as many people as possible do it.

Dansk Vask-, Kosmetik- og Husholdningsindustri and Nopa Nordic

- It is not allowed to add pigments to PET used for bottle.

Hvorfor må man kun på PE og PP, og ikke PET?

Må de kun være transparente eller er hvid ok?

- Dark colours must not be used in bottle.

Hvad nu hvis genbrugsmaterialet i sin naturlige farve er mørk? Må man så godt have lov til at anvende dette?

Må vi have lov til at anvende Nir-detekterende sort farve uden carbon black?

- Forslag til hvordan vi kan måle "Dark colours" er ved at se på L-værdien i farven: (ISO 12647-2:2004)

| | papir | | | cyan | | | magenta | | | gul | | | sort | | |
|------------------|-------|----|----|-----------------|-----------------|-----------------|-----------------|----|----|-----|----|----|------|----|----|
| | L* | a* | b* | L* | a* | b* | L* | a* | b* | L* | a* | b* | L* | a* | b* |
| Blankt bestrøget | 95 | 0 | -2 | 55 | -37 | -50 | 48 | 24 | -3 | 91 | -5 | 93 | 16 | 0 | 0 |
| Matbestrøget | 94 | 0 | -2 | 55 | -37 | -50 | 48 | 24 | -3 | 91 | -5 | 93 | 16 | 0 | 0 |
| Ubestrøget | 95 | 0 | -2 | 60 | -26 | -44 | 56 | 61 | -1 | 89 | -4 | 78 | 31 | 1 | 1 |
| Tolerancer | +3 | +2 | +2 | ΔE ₄ | ΔE ₄ | ΔE ₅ | ΔE ₄ | | | | | | | | |

Tabel 1: ISO 12647-2:2004. Der måles med trykarkat på en hvid baggrund med spektrofotometer
Indstillet til: D₅₀, Illuminant 2°, Observer 0/45 eller 45/0 geometri.

- Labels. The calculations of the percentage shall be based on the two-dimensional pro-files of the bottle.

De 60% som vi har regnet på er hele overfladen på flasken. Hvis det kun er todimensionel (for- og bagside) man kigger på flasken, kan vi komme i udfordringer med nogle nuværende formater. Må man have lov til at medtage siderne på flaskerne?

For tekstilvask vil en etiket som kun må dække 60% give store udfordringer, da der er meget lovpligtig tekst. Det kan presse os hen imod foldeud etiketter, som man kun kan få i papir eller PP. Der er forholdsvis meget mere tekst på et tekstilvaskemiddel, end på et rengø-ringsmiddel eller opvaskemiddel

Hvad med en rund flaske hvor etiketten går omkring flasken og ikke sidder på én side?

Comments from Nordic Ecolabelling

Tack för kommentarerna

Angående klar PET så har färgad återvunnen PET ingen marknad idag och bränns i de flesta återvinningsanläggningar. Svanenmärkning vill inte främja ett material som inte materialåtervinns idag och kravet att PET ska vara ofärgad behålls. Dock läggs det till en precisering att om återvunnen PET med färg som härstammar från återvunnet material är accepterad.

Tack för förslaget angående mörka färger. Vi har undersökt möjligheten och menar att det blir för arbetskrävande jämfört med miljönnyttan i dagsläget att ställa krav på mörka färger. Vi har istället valt att förbjuda användningen av carbon black.

Det är viktigt att förpackning kan återvinnas och rätt detektion på återvinningsstation är väsentligt. I bakgrund står det: "If the NIR detector at the sorting facility hits the label instead of the bottle, the bottle may end up in the rejected fraction." Därför vill vi hålla fast i gränsen på 60 %.

Vi ser att vår förklaring på hur man räknar 60 % var inte tydlig nog. Vi har justerat det i kriterierna.

Orkla Home&Personal Care

Svanen stilte spørsmål om det finnes en god måte å ekskludere kun de mørke fargene som reduserer kvaliteten på resirkulert plast mest?

Den kjennskapen OHPC sitter med angående dette er at det kun er fargestoffet «Carbon Black» som ikke leses av de infrarøde sensorene og at alle andre mørke fargestoff er OK. OHPC mener da at å forby dette fargestoffet vil være tilstrekkelig.

Comments from Nordic Ecolabelling

Tack för svaret. Syftet med förbudet och frågan om mörka färger var inte NIR-detektion utan kvaliteten av den sorterade fraktionen.

Vi har undersökt de förslag vi har fått och menar att det blir för arbetskrävande jämfört med miljönyttan i dagsläget att ställa krav på mörka färger. Vi har istället valt att förbjuda användningen av carbon black.

BlueSun Consumer Brands S.L.U

~~Only white pigment can be added to the~~ Dark colours must not be used in box/bottle/container of PP or PE. – We have asked our suppliers to help us define Dark colours, but there is no standard that defines dark colours, the only criteria set regarding the colour of the packaging is for the sorting of the recyclable process: **“Colors with an L value less than 40 or an NIR reflectance less than or equal to 10 percent may interfere with NIR sorting technology”**

We recommend that NS consult directly with the recycling industry to see if they are able to help us define Dark colours.

Barriers are not allowed in plastic packaging – Could you please define what type of Barriers are not allowed? For example, we have UV filters and antistatic filters on our plastic packaging, will this be allowed?

Metal must not be part of the packaging (box/bottle/container, closure or label). – This is not a viable for us at the moment, as commented on the previous consultation, for big formats of Powder Products, we add a handle on the packaging to make it easier for our consumers to transport the product and this is attached on the packaging using a rivet made from metal, but we will be looking to see if we can find alternatives.

Comments from Nordic Ecolabelling

Thank you for the suggestion regarding dark colors. We have investigated the possibility and our conclusion is that it will be too much work compared to the environmental benefits at present to set requirements for dark colors. Instead, we have chosen to exclude the use of carbon black.

When it comes to barriers, we have in further dialogue come to conclusion that the antistatic filters used in packaging are not barriers and are allowed. We would like to encourage to minimize the use of chemicals also in the packaging and only use filters that have a necessary function. However, no requirements are set for such packaging chemicals yet. We will look into that when criteria are next revised.

Metal handles in cardboard boxes are allowed.

RB

- The suggested demand for the label to only cover 60% of the container could be a challenge especially for stain-removers. Currently we have Nordic packs and hence a legal requirement to have 4 languages on our packs. If we were to reduce the label to only 60%, we would only be able to fit 2 languages on the pack. Hence would increase complexity for us as a company and would likely increase scrapping and waste, when changing formulas or packaging design. We suggest your focus should be on recyclability independent of decoration used or the % label coverage of the bottle/container. If you are to maintain the demand for only 60% coverage of label we suggest you the add following exemptions from the criteria:
 - o Perforated sleeve allowing the consumer to separate sleeve and bottle before recycling or
 - o Ask the license holder to document that container even with a sleeve or label can be recycled.

Comments from Nordic Ecolabelling

Thank you for your comments. It is Nordic Ecolabelling's job to stimulate the market to a more sustainable and environmentally friendly direction. There are good examples of packaging where label covers maximum 60 % of the container and where multiple languages are used. If the NIR detector at the sorting facility hits the label instead of the bottle, the bottle may end up in the rejected fraction which is contrary to the objective to increase recycling.

We can promote more sustainable packaging also by excluding the use of PET-G. The option of asking consumers to separate the label from packaging before it is returned to recycling is not a solution as recycling should be as simple as possible so that as many people as possible do it.

Suomen Uusiomuovi Oy

It would be important that the criterias would take into account the circle economy in total. It is not only important that the packaging can be recycled but that recycled plastics can be used in the packaging. It is also important that waste from household packaging can be used -> those do create not transparent or white for ex bottles. Consumers should and will need to accept also not so fancy colors to support use of recycled plastics in products.

The recycling process will not work without a big increase where recycled plastics can be used. Since food contact is now restricted technokem products is the obvious end use target. It should be a really big environmental benefit if recycled plastic packaging can be used – and the packaging then still allowing recycling again, and again. That is a real cradle to cradle approach.

What is dark colors is difficult to state.....+ there is now black plastics that can be recycled. In any case the rules you make should not limit the access of supply for the packaging makers and users.

In Finland PETG sleeves do not affect the sorting of PET. Neither does the PETG affect in any bigger way the current PET stream use in recycling. It is worth understanding that since the deposit system handles most of the clear PET bottles in

the Nordic countries our non-deposit stream contains many purness levels and colors of PET. A bit of petg sleeves in that stream is a minor issue.....

Comments from Nordic Ecolabelling

Thank you for your comments. We try to stimulate the use of recycled plastics in the packaging of these kinds of products.

Thank you also for your input on PETG and dark colours. We have decided to keep the requirement that PET-G is not allowed as we have heard from several sources that larger quantities of PET-G start interfere with recycling. It is Nordic Ecolabelling's job to stimulate the market to a more sustainable and environmentally friendly direction.

When it comes to dark colours, the purpose of the ban and the question of dark colors was not NIR detection but the quality of the sorted fraction. We have investigated the suggestions that we received, and our conclusion is that it will be too much work compared to the environmental benefits at present to set requirements for dark colors. Instead, we have chosen to exclude the use of carbon black.

Lactips

“Please note that foil that is not removed before use of the product is counted as part of the formulation/ingredient, and not as packaging.”

Amendments and new proposition: same comment as part 4. Dosage, ecotoxicity and biodegradability and same proposition.

Comments from Nordic Ecolabelling

Please see our replies under your other comments.

O21 Design for recycling of flexible plastic pouches/bags

BlueSun Consumer Brands S.L.U

The primary plastic packaging (excluding labels) must be made from monomaterial of polyethylene (PE), polypropylene (PP) or polyethylene terephthalate (PET). – Our aim is to use monomaterials, but the supplier chain for this type of material is low and the demand is high. We have also been doing internal tests using monomaterials on our pouches:

- Pouches without spout / zipper: Good preliminary results.
- Pouches with spout or zipper (needed for Laundry capsules): No solution found until now, working with suppliers. – This is very important requirement for us, because we are in process of developing NS Laundry detergent capsules and regarding the WUR requirements and limits that are set by NS, we are not able to use plastic containers as our primary packaging for our capsules, we will need to use pouches.

Comments from Nordic Ecolabelling

Thank you for your comments and further dialogue we have had. We have decided to keep the requirement as it was on the consultation. However, we understand that this might be problematic and want to continue dialogue with our license holders during the transition period that will be longer than normal in order to give time to find solutions.

Dansk Vask-, Kosmetik- og Husholdningsindustri and Nopa Nordic

- The plastic packaging must be made from PE, PP or PET and the pouch should be in mono material.

På nuværende tidspunkt er der ingen af de leverandører vi har kontakt til som kan le-vere dette til flydende indhold.

Vi arbejder med vores leverandører om at få lavet et mono produkt, men dette kræver mange test og tid. Er det okay at blande PP og PE når de på papiret er forenelige materiale, som i mange tilfælde også bliver genanvendt sammen?

- Only 60% of the packaging surface may be printed.

Vi skal have uddybet denne med lidt flere betingelser. Mange doypacks er vel 100% printet?

Hvad beregner man ud fra med eller uden bund?

Det er vel også en af fordelene ved doypacks at man kan printe på et større område end på en label.

Doypacken er vel mere miljørigtig en flasker i forsendelse? Er man ikke bange for at kunderne vælger det fra når de ikke kan printe mere en 60% procent.

Comments from Nordic Ecolabelling

Tack för era kommentarer och ytterligare dialog vi har haft. Vi har dock valt att behålla kravet som den var på remiss även om vi förstår det är inte lätt att hitta alternativ. Vi önskar fortsatt dialog och har valt att ge en längre övergångsperiod än vanligt för att ge mer tid för att hitta alternativa lösningar.

Vi ha även valt att ta bort kravet om att enbart 60 % av förpackningens yta ska vara tryckt. Se det gemensamma svaret nedan.

BlueSun Consumer Brands S.L.U

Only 60% of the packaging surface may be printed- This requirement is not viable, because there are set rules for the packaging of the liquid laundry detergent capsules set by CLP Regulation (EC) No 1272/2008:

*“The outer packaging shall be **opaque or obscure** so that it impedes the visibility of the product or individual doses”. This requirement is set to avoid the curiosity of children, as most capsules can mislead them into thinking that the capsules are candy. Therefore, the pouches need to be 100% printed.*

KiiltoClean Oy

Design for recycling of flexible plastic pouches/bags: Only 60% of the packaging surface may be printed

- *What does this mean in practise? Normally the pouch is printed throughout, it makes no sense to print only part of it. We do not see the benefit in this restriction to 60 % coverage. We propose that this requirement is removed.*

Comments from Nordic Ecolabelling

Thank you for your comments and the referral to CLP regulation. We have thus decided to remove this requirement.

Orkla Home&Personal Care

Svanen stilte spørsmål om det finnes en god måte å ekskludere kun de mørke fargene som reduserer kvaliteten på resirkulert plast mest?

Den kjennskapen OHPC sitter med angående dette er at det kun er fargestoffet «Carbon Black» som ikke leses av de infrarøde sensorene og at alle andre mørke fargestoff er OK. OHPC mener da at å forby dette fargestoffet vil være tilstrekkelig.

Comments from Nordic Ecolabelling

Tack för svaret. Syftet med förbudet och frågan om mörka färger var inte NIR-detektion utan kvaliteten av den sorterade fraktionen.

Vi har undersökt de förslag vi har fått och menar att det blir för arbetskrävande jämfört med miljönyttan i dagsläget att ställa krav på mörka färger. Vi har istället valt att förbjuda användningen av carbon black. Ett undantag för tryck av text och färoangivelse och liknande har tillsatts.

O22 Weight-Utility Ratio (WUR)

BlueSun Consumer Brands S.L.U

Thank you for changing the WUR limit from 0.9 to 1.1 g/kg wash, this is a more viable limit!

Other types of packaging can currently not be used. – Lately there has been a tendency to use Bio-Material packaging and also there is a new technology which consists on an additive that when combined with any popular plastic resin (polyethylene and / or polypropylene) it accelerates the biodegradability of the plastic when left on landfills, etc.. This requirement limits any type of innovation that could help reduce the quantity of plastic packaging. Why doesn't NS not accept any other type of packaging?

Comments from Nordic Ecolabelling

Thank you for your support in WUR requirement.

Nordic Ecolabelling wishes to promote packaging for which there is recycling systems as there is an EU target that 55 % of packaging waste is recycled by 2025 and that by 2030, all plastics packaging placed on the EU market is reusable or easily recycled. As these novel materials and biodegradable materials cannot be recycled chooses Nordic Ecolabelling to not accept them. If the situation with recycling changes, will we consider this again when the criteria is next revised.

4.2.7 Appendices

Appendix 1. Analyses, test methods and calculations

Lactips

5 Aerobic biodegradability

“Test methods 301 (A to F) or 310 in the OECD Guidelines for the Testing of Chemicals should be used to test aerobic biodegradability. Other scientifically accepted test methods may also be used. The test results of such equivalent methods must be evaluated by an independent body.”

Amendments or reason to rejecting the proposal: We reject the proposal because we think it is necessary to mention exhaustively all the tests that can be used and to remove the part “other scientifically accepted test methods”. In fact, each tests can be realize with a chosen method. All the tests are not automatically equivalent between them. Furthermore, some companies create specifics methods to allow their products to be used. This remark is valid for each “other scientifically accepted test methods or equivalent test methods”, for example in the biodegradability anaerobic, aquatic toxicity...

In view of the latest alarming findings on the worldwide pollution of the water system with plastics and chemicals, we reject the proposal because the soluble wrapping film for laundry detergent products should always be tested with the same method, and with a stricter method.

For the Aerobic biodegradability, the substances have actually to be tested according to test methods OECD 301 A-F or 310 (readily biodegradable). It means that the soluble wrapping film for laundry detergent should also be tested by one of these seven different methods.

In the equivalent methods, an acclimatisation of microorganisms can be perform before the biodegradation tests such as ASTM D6691.

It is known from scientific publications that the long-term acclimatisation of the microbial populations is a stringent parameter for an efficient removal of the polymer. Negligible biodegradation can be recorded in the presence of non-acclimated domestic sludge microorganisms or complete biodegradation can be observed in the presence of suitable microorganisms under appropriate incubation conditions.

As well for a polymer product, as for the soluble wrapping film for laundry detergent products, a method should be decided upon to have a common standard to compare the biodegradation of the different types of films.

Finally, the different methods mentioned don't have the same quality level of evaluation. The OECD 301 F (Manometric Respirometry) test is the most accurate and the least easy to pass. The OECD 301 B or Sturm Test can degrade just about everything and is often chosen to hide a poor degradation.

As polymer accumulation in water is an increasingly serious stake, we would suggest to use the most severe method to evaluate the biodegradation of soluble wrapping film for laundry detergent products.

Comments from Nordic Ecolabelling

Thank you for your comment. We are aware that different tesst have different qualities. We however feel that we need to accept those test methods accepted in the EU regulations. To clarify the matter, we have however decided to add following text to the appendix which has always been praxis: Other scientifically accepted test methods can be used if the test result is evaluated by an independent body and controlled by Nordic Ecolabelling.

Appendix 3. Declaration from the manufacturer/supplier of the raw material / ingredient

Novozymes A/S

regarding our comment to the requirement to consult the ECHA database.

Comments from Nordic Ecolabelling *Nordic Ecolabelling thanks you for your input. We are aware that the C&L Inventory contains data of varying quality, and that underlying reasons such as impurities may affect the classification. In order to get a comprehensive overview of the raw material composition, we still want the raw material manufacturer to check the C&L Inventory and list any ingoing substances for which any prohibited classifications are reported in the C&L Inventory. Upon listing these substances, if the raw material manufacturer can justify why their ingoing substance should not be classified, Nordic Ecolabelling will accept the specific ingoing substance.* **We object** to a practice whereby we as a manufacturer are forced to take any and every wrong or non-valid classification in ECHA's database into consideration. Especially as the ECHA database is a dynamic list, potentially updated day-to-day, so every single ingredient would need to be rechecked at every single submission. We would also like to share one example, among several, of our concern: **EXAMPLE: For Acetic acid there are 58 notified classifications as of 5/9/2019. Several thousand notifiers agree to the classification: Flam. Liq. 3 (H226); Skin Corr. 1A (H314) However, if you scroll down you will find two entries towards the bottom that includes Aquatic Chronic 3 (H412). Following your requirement, we would all have to declare Acetic acid to you as a H412 substance and at the same time justify why Acetic acid is not H412.** Calcium chloride is another example. And someone could add H412 to Water tomorrow... We acknowledge that there *could* be concern where a manufacturer decides to deviate from agreed / joint classifications, such as those derived from REACH registrations. And in *that* case, it could make sense to ask critical questions. We therefore propose a compromise: **Proposed text** Does the raw material/ingredient contain substances classified as environmentally hazardous with H410, H411 and H412, incl. Joint Entries in the ECHA database? (also, consider changing "H410, H411 and H412" to "H410, H411 or H412", just for clarity...)

Comments from Nordic Ecolabelling

Thank you for your comment. We have decided to change the text to "Please note that in order to assess classification, all available data must have been evaluated, including data in ECHA database" to clarify that all available data must be taken into account when classifying a chemical, but this does not automatically mean that a chemical needs to be classified according to each entry in ECHA's database.

Appendix 5A Test description for heavy-duty laundry detergents

BlueSun Consumer Brands S.L.U

2 Washing machines and wash programmes

2.1 Washing machines:

[We would like to know why NS doesn't consider using programmable electronic Miele household washing machines to do the performance tests? NS could consider the requirements set for Ecolabel regarding the washing machines:](#)

3.2 Washing machine types:

Programmable electronic Miele¹ household washing machines which fulfil the following requirements:

Table 1. Washing machine and wash programmes specifications

| | Cotton wash program (at 30 °C, 20 °C ^a , 15 °C ^b) | Delicate program ⁿ (at 30 °C, 20 °C ^a , 15 °C ^b) |
|--------------------------|---|---|
| Duration main wash | 50-70 min | 30-40 min |
| Total program duration | 100-120 min | 55-65 min |
| Water quantity main wash | 15±2 l | 20±2 l |
| Total water quantity | 55±5 l | 64±5 l |
| Number of rinse cycles | 3 | 3 |
| Final spin speed | 1200 rpm ² | 600 rpm |

4.3 The reference detergent:

Regular standard powder detergent IEC P (that can serve as reference for a detergent to wash white fabrics). – [Is this a commercial detergent?](#)

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. The listed Miele machines are especially designed for labs. These are the ones that are recommended by Miele for testing purposes. Furthermore, according to information that we have got from Miele, newer washing machines will not fulfil the specifications in table 1 because of stricter energy requirements and hence longer washing time.

Yes, IEC P is a commercial detergent.

5 Discussions and conclusions

Several consultation comments have been received to the proposed criteria. The Final proposal was commented by 16 stakeholders and total of 50 different stakeholders commented at least one of the consultations. Nordic Ecolabelling is grateful for all responses.

Of the 29 requirements 11 were not commented on the final consultation round. Packaging requirements, microplastics definition, exclusion of EUH208 and dosage requirements were commented the most.

The biggest changes after the sub consultation have been made to the packaging requirements. The idea of recycling and recyclability seems to be generally accepted but details cause concern and several adjustments and changes have been made to the requirements.

The definition of microplastics was changed to the one used in EU Ecolabel as the ECHA definition is not final yet. However, a disclaimer that the definition might be changed after the ECHA restriction proposal is finalized has been added. An appropriate transition period would be decided.

The new consumer guidance requirements for recycling and dosage were also supported, but some questions arose, and minor changes have been made. Other

smaller adjustments and clarifications have been made to some requirements. These changes are listed in the table 2 below.

Table 2 Overview of main changes done in the draft generation 8 of criteria for laundry detergents and stain removers, based on received consultation responses.

| Requirement in final draft for consultation | Change in the requirements after the consultation |
|--|---|
| O2 Classification of the product | EUH208 exempted. |
| O6 Prohibited substances | Definitions of microplastics and EDC have been adjusted. |
| O10 Maximum dosage | Text on capsules in medium hard/hard water or lightly/heavily soiled textiles as been adjusted. |
| O14 Dosage instructions | Small adjustments for dosing scale in different packaging and size of table spoon were made. |
| O16 Recycling guidance on packaging | Text that recycling of the packaging most commonly means as plastics or as cardboard in Nordic countries. |
| O19 Recycling and recycled material in packaging | Limit value for corrugated board adjusted. |
| O20 Design for recycling of plastic packaging (except pouches) | Several adjustments, carbon black excluded instead of dark colours. |
| O21 Design for recycling of flexible plastic pouches/bags | Several adjustments, carbon black excluded instead of dark colours, limit of 60 % print deleted. |
| Appendix 1 | Minor adjustments. |
| Appendix 2 | Text "Incl self-classification in the ECHA database" changed to "Please note that in order to assess classification, all available data must have been evaluated, including data in ECHA database". |
| Appendix 3 | Text "Incl self-classification in the ECHA database" changed to "Please note that in order to assess classification, all available data must have been evaluated, including data in ECHA database". |
| Appendix 4 | Adjusted according to changes in the requirements O16-O21. |